| 1 | WILDE & ASSOCIATES Electro | nically Filed on $1/8/2010$ |
|-----|--|--|
| 2 | Gregory L. Wilde, Esq. Nevada Bar No. 004417 | 10 10 |
| 3 | 208 South Jones Boulevard Las Vegas, Nevada 89107 | |
| 4 | Telephone: 702 258-8200 bk@wildelaw.com | |
| 5 | Fax: 702 258-8787 | |
| 6 | Attorneys for BAC Home Loans Servicing, L.P. fka Countrywide Home Loans Servicing L.P. | |
| 7 | 19 | |
| 8 | 9: 39 days when the order of | NKRUPTCY COURT |
| 9 | DISTRICT | OF NEVADA |
| 10 | In Re: | Case No: 09-23161-MKN |
| 11 | DUONG LAC | Date:January 13, 2010 |
| 12 | LYANNA LAC | Time: 9:30 a.m. |
| 13 | Debtors. | Chapter 13 |
| 14 | Dottors. | |
| 15 | OPPOSITION TO MOTION TO VALUE C | OLLATERAL, "STRIP OFF" THE RIGHS OF |
| 16 | UNSECURED CREDITORS FOR THE PROGROVE VALLEY STREET LAS VEGAS, NV | OPERTY ADDRESS LOCATED AT 9718 ELK 7 89178 PURSUANT TO 11 U.S.C. § 506(a) AND |
| | | 1123 |
| 17 | COMES NOW, BAC Home Loans Servicing | g, L.P. fka Countrywide Home Loans Servicing L.P |
| 18 | (hereinafter "Secured Creditor") and files this Oppos | sition stating as follows: |
| 19 | Some confusion surrounds the Debtors' Moti | ion to Value filed on December 11, 2009. |
| 20 | Document 50 of Debtors' motion contains the body | of the motion which makes reference to attached |
| 21 | Exhibits A and B. These exhibits, however, are not a | attached to this Document 50. Document 50-1 of |
| 22 | Debtors' motion appears to be identical to Document | t 50, and again makes reference to the attached |
| 23 | Exhibits A and B. However, like Document 50, thes | |
| 24 | Document 50-2 appears to be identical to Documents | |
| 25 | | |
| 26 | | |
| - 1 | I . | |

attach the referenced Exhibits A and B. Secured Party opposes the motions contained in Documents 50, 50-1, and 50-2 and the accompanying Exhibits A and B.

Secured Creditor is the first deed of trust holder on 9718 Elk Grove Valley Street, Las Vegas, NV 89178 (hereinafter "subject property"), and is owed over \$533,000.00. Prior to the Court reducing the lien to \$268,270.00 (resulting in a \$264,000.00 loss), the Court should allow Secured Creditor to (1) obtain its own valuation of the subject property, and (2) conduct limited discovery to verify that the Debtors are being truthful with the Court as detailed below.

Secured Creditor asserts that the subject property, 9718 Elk Grove Valley Street, Las Vegas, NV 89178, should be treated as the Debtors' personal residence and not subject to a lien-strip of any kind pursuant to 11 USC 1322.

The Debtors claim that the subject property is a rental property, yet (1) their schedule "A" lists the subject property as a single family residence and specifically designates their other property (located in Phoenix, AZ) as an investment property; (2) their schedule "B" (response #4) discloses that Debtors' household goods are located at the Subject Property; (3) their schedule "G" shows no leases for the subject property; (4) their schedule "I" does not appear to show rental income from the subject property; and (5) their schedule "J" does not appear to reflect any rental payments made by Debtors to a landlord. (See exhibits "A", "B", "C", "D" and "E" respectively). If the Debtors are not occupying the Suject Property, then it can be assumed that they are treating it as a rental property which should be generating rental income.

Moreover, the Debtors lists the subject property as their street and mailing address in their petition filed July 23, 2009. (See exhibit "F"). However, on October 21, 2009, the Debtors filed a Notice of Change of Address which changed their address from the subject property to 8841 Don Horton Ave., Las Vegas, NV 89178 (See exhibit "G"). Secured Creditor asserts that it was not the intent of Congress to allow a debtor to move out of its residence during the life of a plan to circumvent the prohibitions of modifying a debt secured by a residence. See 11 USC 1322(c)(2).

There are too many unanswered questions in the Debtors' attempt to treat the subject property 1 as a rental and strip a large portion of Secured Creditor's interest in the same. The Debtors must 2 disclose the information necessary to answer these questions. To this end, Secured Creditor would like 3 to subpoena utility documents to determine if, and when, the Debtors may have lived in the subject 4 property. Secured Creditor would also like to see a copy of any leases the Debtors have concerning the 5 Don Horton property and the subject property and speak with any alleged tenant(s) of the subject 6 7 property. Finally, Secured Creditor disputes the \$268,270.00 valuation of the property. If the Court is 8 inclined to allow the Debtors to go forward, Secured Creditor asks for some time to obtain its own 9 10 appraisal and find out the information listed above. 11 WHEREFORE, Secured Creditor asks that this Court deny the requested relief. 12 DATED this __ day of January, 2009. 13 WILDE & ASSOCIATES 14 B/S/GREGORY L. WILDE 15 GREGORY L. WILDE, ESQ. Attorneys for Secured Creditor 16 208 South Jones Boulevard 17 Las Vegas, Nevada 89107 18 Certificate of Facsimile 19 I certify that on January 8, 2010. I served a copy of the foregoing opposition on Debtors' 20 21 Counsel by facsimile as follows: 22 Samuel A. Schwartz, Esq. Bryan Lindsey, Esq. 23 The Schwartz Law Firm, Inc. Fax No. 702-385-2741 24

25

26

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B6A (Official Form 6A) (12/07)

| In re | Lyanna Lac, | Case No | 09-23161 |
|-------|-------------|---------|----------|
| | Duong Lac | | |

Debtors

SCHEDULE A - REAL PROPERTY

Except as directed below, list all real property in which the debtor has any legal, equitable, or future interest, including all property owned as a cotenant, community property, or in which the debtor has a life estate. Include any property in which the debtor holds rights and powers exercisable for the debtor's own benefit. If the debtor is married, state whether husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor holds no interest in real property, write "None" under "Description and Location of Property."

Do not include interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If an entity claims to have a lien or hold a secured interest in any property, state the amount of the secured claim. See Schedule D. If no entity claims to hold a secured interest in the property, write "None" in the column labeled "Amount of Secured Claim." If the debtor is an individual or if a joint petition is filed, state the amount of any exemption claimed in the property only in Schedule C - Property Claimed as Exempt.

| Description and Location of Property | Nature of Debtor's Interest in Property | Husband, Wife, Joint, or Community | Current Value of Debtor's Interest in Property, without Deducting any Secured Claim or Exemption | Amount of Secured Claim |
|--|--|---|--|----------------------------|
| Single Family Residence: 5 Bedroom/3 Bathroom; Approximately 3,495 sq.ft. 9718 Elk Grove Valley St. Las Vegas, NV 89178 | | w | 352,000.00 | 503,100.00 |
| Approximately 2,555 sq. ft. 1816 N. 94th Glen, Phoenix, AZ 85037 | | С | 146,375.00 | 228,541.00 |

Sub-Total > 498,375.00 (Total of this page)

Total >

498,375.00

(Report also on Summary of Schedules)

ontinuation sheets attached to the Schedule of Real Property



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B6B (Official Form 6B) (12/07)

| In re | Lyanna Lac, |
|-------|------------------|
| | Duong Lac |

| Case No. | 09-23161 | |
|----------|----------|--|
| Case No. | 09-23101 | |

Debtors

SCHEDULE B - PERSONAL PROPERTY

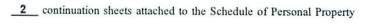
Except as directed below, list all personal property of the debtor of whatever kind. If the debtor has no property in one or more of the categories, place an "x" in the appropriate position in the column labeled "None." If additional space is needed in any category, attach a separate sheet properly identified with the case name, case number, and the number of the category. If the debtor is married, state whether husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor is an individual or a joint petition is filed, state the amount of any exemptions claimed only in Schedule C - Property Claimed as Exempt.

Do not list interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If the property is being held for the debtor by someone else, state that person's name and address under "Description and Location of Property." If the property is being held for a minor child, simply state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

| | Type of Property | N O Description and Location of Property E | Husband, Wife, Joint, or Community | Current Value of Debtor's Interest in Property without Deducting any Secured Claim or Exemption |
|-----|---|---|---|--|
| I. | Cash on hand | х | | |
| 2. | Checking, savings or other financial accounts, certificates of deposit, or shares in banks, savings and loan, | Wells Fargo Savings Account Account Ending in 2786 | С | 71.17 |
| | thrift, building and loan, and homestead associations, or credit unions, brokerage houses, or | Wells Fargo Checking Account Account Ending in 6343 | С | 514.81 |
| | cooperatives. | Bank of America Checking Account | С | 1,000.00 |
| 3. | Security deposits with public utilities, telephone companies, landlords, and others. | х | | |
| 4. | Household goods and furnishings, including audio, video, and computer equipment. | Household Goods and Furnishings Location: 9718 Elk Grove Valley St, Las Vegas NV | С | 7,000.00 |
| 5. | Books, pictures and other art objects, antiques, stamp, coin, record, tape, compact disc, and other collections or collectibles. | x | | |
| 6. | Wearing apparel. | Clothing | С | 2,000.00 |
| 7. | Furs and jewelry. | Jewelry | С | 2,000.00 |
| 8. | Firearms and sports, photographic, and other hobby equipment. | x | | |
| 9. | Interests in insurance policies. Name insurance company of each policy and itemize surrender or refund value of each. | x | | |
| 10. | Annuities. Itemize and name each issuer. | x | | |

Sub-Total > 12,585.98
(Total of this page)





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B6G (Official Form 6G) (12/07)

In re

Lyanna Lac, Duong Lac Case No. 09-23161

Debtors

SCHEDULE G - EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Describe all executory contracts of any nature and all unexpired leases of real or personal property. Include any timeshare interests. State nature of debtor's interest in contract, i.e., "Purchaser", "Agent", etc. State whether debtor is the lessor or lessee of a lease. Provide the names and complete mailing addresses of all other parties to each lease or contract described. If a minor child is a party to one of the leases or contracts, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

☐ Check this box if debtor has no executory contracts or unexpired leases.

Name and Mailing Address, Including Zip Code, of Other Parties to Lease or Contract Description of Contract or Lease and Nature of Debtor's Interest. State whether lease is for nonresidential real property. State contract number of any government contract.

Bakary Kane and Diane Hamilton 1816 N 94th Glen Phoenix, AZ 85037

Sonya Ross 8841 Don Horton Street Las Vegas, NV 89178 Residential Rental Agreement Debtor's Interest: Owner of Property

Residential Lease



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B6I (Official Form 6I) (12/07)

| ₽ 1000000 | Lyanna Lac | | | | |
|------------------|------------|-----------|----------|----------|--|
| In re | Duong Lac | | Case No. | 09-23161 | |
| | | Debtor(s) | | | |

SCHEDULE I - CURRENT INCOME OF INDIVIDUAL DEBTOR(S)

The column labeled "Spouse" must be completed in all cases filed by joint debtors and by every married debtor, whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed. Do not state the name of any minor child. The average monthly income calculated on this form may differ from the current monthly income calculated on Form 22A, 22B, or 22C.

| Debtor's Marital Status: | DEPENDENT | TS OF DEBTOR | AND SPOUSE | | |
|---|---|-------------------------------|---------------------------------------|------------|------------|
| Married | RELATIONSHIP(S): None. | | | | |
| Employment: | DEBTOR | | SPOUSE | | |
| Occupation | | | | | |
| Name of Employer | Paradise Nails & Tan, Inc. | The Ver | netion | | |
| How long employed | | | | | |
| Address of Employer | 1634 W. Warm Springs Road Henderson, NV 89014 | | as Vegas Blvd. South gas, NV 89109 | | |
| INCOME: (Estimate of average | ge or projected monthly income at time case filed) | | DEBTOR | | SPOUSE |
| | y, and commissions (Prorate if not paid monthly) | | \$2,600.00 | \$ _ | 3,338.40 |
| 2. Estimate monthly overtime | | | \$ | s _ | 0.00 |
| 3. SUBTOTAL | | | \$2,600.00 | \$_ | 3,338.40 |
| 4. LESS PAYROLL DEDUCT | | | 2 | | |
| a. Payroll taxes and socia | d security | | \$ 0.00 | s _ | 477.40 |
| b. Insurance | | | \$0.00 | s _ | 82.77 |
| c. Union dues | | | \$0.00 | 8 _ | 0.00 |
| d. Other (Specify): | Long Term Disability | | \$0.00 | \$_ | 97.22 |
| | 401K | | \$ | s _ | 335.92 |
| 5. SUBTOTAL OF PAYROLI | DEDUCTIONS | | \$ | s | 993.31 |
| 6. TOTAL NET MONTHLY T | TAKE HOME PAY | | \$ | s | 2,345.09 |
| 7. Regular income from operat | tion of business or profession or farm (Attach detailed s | tatement) | \$ 0.00 | \$_ | 0.00 |
| 8. Income from real property | | | \$ 1,100.00 | \$ | 0.00 |
| 9. Interest and dividends | | 100-100 or 200 gen 100-100 fg | \$ 0.00 | \$_ | 0.00 |
| dependents listed above | support payments payable to the debtor for the debtor's | use or that of | \$ | s _ | 0.00 |
| Social security or governm (Specify): | | | \$ 0.00 | | 0.00 |
| (specify). | | | \$ 0.00 | ું – | 0.00 |
| 12. Pension or retirement incom | ma | | \$ 0.00 | ° – | 0.00 |
| 13. Other monthly income | ine | | J | • — | 0.00 |
| (Specify): | | | \$ 0.00 | S | 0.00 |
| | | - | \$ 0.00 | s | 0.00 |
| | | | | | 32,000,000 |
| 14. SUBTOTAL OF LINES 7 | THROUGH 13 | | \$1,100.00 | s_ | 0.00 |
| 15. AVERAGE MONTHLY II | NCOME (Add amounts shown on lines 6 and 14) | | \$3,700.00 | \$_ | 2,345.09 |
| 16. COMBINED AVERAGE | MONTHLY INCOME: (Combine column totals from li | ine 15) | ss | 6,045 | .09 |

(Report also on Summary of Schedules and, if applicable, on Statistical Summary of Certain Liabilities and Related Data)

17. Describe any increase or decrease in income reasonably anticipated to occur within the year following the filing of this document:



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B6J (Official Form 6J) (12/07)

| In re | Lyanna Lac Duong Lac | | Case No. | 09-23161 | |
|-------|-------------------------|-----------|----------|----------|--|
| | | Debtor(s) | | | |

SCHEDULE J - CURRENT EXPENDITURES OF INDIVIDUAL DEBTOR(S)

Complete this schedule by estimating the average or projected monthly expenses of the debtor and the debtor's family at time case filed. Prorate any payments made bi-weekly, quarterly, semi-annually, or annually to show monthly rate. The average monthly expenses calculated on this form may differ from the deductions from income allowed on Form 22A or 22C.

| expenses calculated on this form may differ from the deductions from income allowed on Form 22A or 2. | 2C. | e monthly |
|--|---------------|---|
| ☐ Check this box if a joint petition is filed and debtor's spouse maintains a separate household. Complexpenditures labeled "Spouse." | ete a separat | e schedule of |
| 1. Rent or home mortgage payment (include lot rented for mobile home) | \$ | 1,500.00 |
| a. Are real estate taxes included? Yes No _X | | .,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| b. Is property insurance included? Yes No _X | | |
| 2. Utilities: a. Electricity and heating fuel | \$ | 130.00 |
| b. Water and sewer | \$ | 0.00 |
| c. Telephone | \$ | 80.00 |
| d. Other Cable/Internet/Phone | \$ | 160.00 |
| Home maintenance (repairs and upkeep) Food | \$ | 300.00 |
| 5. Clothing | \$ | 900.00 |
| 6. Laundry and dry cleaning | \$ | 300.00 |
| 7. Medical and dental expenses | \$ | 150.00 50.00 |
| 8. Transportation (not including car payments) | \$ | 650.00 |
| 9. Recreation, clubs and entertainment, newspapers, magazines, etc. | <u>\$</u> —— | 300.00 |
| 10. Charitable contributions | \$ | 0.00 |
| 11. Insurance (not deducted from wages or included in home mortgage payments) | — | 0.00 |
| a. Homeowner's or renter's | \$ | 0.00 |
| b. Life | \$ | 0.00 |
| c. Health | \$ | 0.00 |
| d. Auto | \$ | 650.00 |
| e. Other 12. Taxes (not deducted from wages or included in home mortgage payments) | \$ | 0.00 |
| | *** | |
| (Specify) | \$ | 0.00 |
| 13. Installment payments: (In chapter 11, 12, and 13 cases, do not list payments to be included in the | - | |
| plan) | | |
| a. Auto | \$ | 0.00 |
| b. Other | \$ | 0.00 |
| c. Other | \$ | 0.00 |
| 14. Alimony, maintenance, and support paid to others | \$ | 0.00 |
| 15. Payments for support of additional dependents not living at your home | \$ | 0.00 |
| Regular expenses from operation of business, profession, or farm (attach detailed statement) Other | <u>s</u> | 0.00 |
| 17. Other Other | \$ | 0.00 |
| | \$ | 0.00 |
| 18. AVERAGE MONTHLY EXPENSES (Total lines 1-17. Report also on Summary of Schedules and, if applicable, on the Statistical Summary of Certain Liabilities and Related Data.) | \$ | 5,170.00 |
| | | |
| 19. Describe any increase or decrease in expenditures reasonably anticipated to occur within the year following the filing of this document: | | |
| | | |
| 20. STATEMENT OF MONTHLY NET INCOME | - | |
| a. Average monthly income from Line 15 of Schedule I | \$ | 6,045.09 |
| b. Average monthly expenses from Line 18 above | \$ | 5,170.00 |
| c. Monthly net income (a. minus b.) | \$ | 875.09 |



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| B1 (Official Form 1)(1/08) | | *************************************** | | | | | | |
|--|--|---|----------------------|--|---|---|--|-------------------------------|
| Market and the second s | d States Bank District of P | kruptcy (Nevada | Court | į. | | | Voluntary | Petition |
| Name of Debtor (if individual, enter Last, Fir Lac, Lyanna | st, Middle): | | | ne of Joint E ac, Duon | | se) (Last, First, M | viiddle): | |
| All Other Names used by the Debtor in the la (include married, maiden, and trade names): | all Other Names used by the Debtor in the last 8 years include married, maiden, and trade names): | | | | | e Joint Debtor in id trade names): | the last 8 years | |
| Last four digits of Soc. Sec. or Individual-Tax (if more than one, state all) xxx-xx-1532 | | o./Complete EIN | (if mo | four digits ore than one, | , state all) | or Individual-Ta | xpayer I.D. (ITIN) No | o./Complete EIN |
| Street Address of Debtor (No. and Street, City, and State): 9718 Elk Grove Valley St Las Vegas, NV ZIP Code | | | | et Address o | of Joint Debto Grove Valle | эт (No. and Stree ay St | et, City, and Statej: | ZIP Code |
| County of Residence or of the Principal Place of Business: Clark | | | | nty of Resid | dence or of the | e Principal Place | of Business: | 89178 |
| Mailing Address of Debtor (if different from street address): | | | | | s of Joint Deb | otor (if different | from street address): | |
| | | ZIP Code | 1 | | | | | ZIP Code |
| Location of Principal Assets of Business Debt (if different from street address above): | or | | | | | | *************************************** | |
| Type of Debtor (Form of Organization) (Check one box) Individual (includes Joint Debtors) See Exhibit D on page 2 of this form Corporation (includes LLC and LLP) Partnership Other (If debtor is not one of the above entities, check this box and state type of entity below.) Tax-Exempt Entit (Check one box) Health Care Business Single Asset Real Estate in 11 U.S.C. § 101 (51B) Railroad Commodity Broker Clearing Bank Other Tax-Exempt Entit (Check box. if application) Tax-Exempt Entit (Check box. if application) Check one box) | | | nization | definer "incur | the store 7 of the 1 | Petition is Filed Chap of a l Chap of a l Nature of (Check on consumer debts, | Debts of business | ecognition ding ecognition |
| Filing Fee (Check of Full Filing Fee attached Filing Fee to be paid in installments (application for the court's conis unable to pay fee except in installments. Filing Fee waiver requested (applicable to attach signed application for the court's conditional for the court's condit | cable to individuals on sideration certifying Rule 1006(b). See Off chanter 7 individuals | g that the debtor fficial Form 3A. | Check | Debtor is Debtor is Cif. Debtor's to insident all applica A plan is Acceptance | s a small busing not a small busing not a small busing aggregate nones or affiliates) able boxes: being filed witces of the plan | Chapter II Del ness debtor as de business debtor a neontingent liqui) are less than \$2 with this perition. | btors rfined in 11 U.S.C. § s defined in 11 U.S.C idated debts (excludir 2,190,000. | C. § 101(51D). ng debts owed |
| Statistical/Administrative Information Debtor estimates that funds will be available Debtor estimates that, after any exempt prothere will be no funds available for distributes that the protection of the prot | nerry is excluded and | d administrativa | tors. | | | | ACE IS FOR COURT U | |
| 1- 50- 100- 200- 49 99 199 999 | 1,000- 5,001- 5,000 10,000 | 10,001- 25 25,000 50 |] 5,001- 0,000 | 50,001- 100,000 | OVER 100.000 | | | |
| Estimated Assets | 100,000,001 100,000,001 102,00 102,00 103,00 | to 7100 to 3 | 100,000,001 | 00,000,001 00,000,000 00,000,000 | D More than | and "Agreement of the access and | | |
| Estimated Liabilities | S1,000,001 \$10,000,001 | 1 \$50,000,001 \$10 | 100,000,001 | S500,000,001 | More than | | | |

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United States Bankruptcy Court District of Nevada

| in re Lyanna and Di | long Lac | | Case No. | 09-23161-MKN | |
|------------------------|-------------------|--------------------------|----------|--------------|--|
| 510 | | Debtor(s) | Chapter | 13 | |
| | | Notice of Change of A | ddress | | |
| Debtor's Social Securi | ty Number: | жж-жж-0000 | | | |
| My (Our) Former M | ailing Address ar | nd Telephone Number was: | | | |
| Name: | Lyanna and Due | ong Lac | | | |
| Street: | 9718 Elk Grove | Valley Street, | | | |
| City, State and Zip: | Las Vegas, NV | 89178 | | | |
| Telephone #: | Same | | | | |
| | | | | | |

Please be advised that effective July 10, 2009, my (our) new mailing address and telephone number is:

Name:

Lyanna and Duong Lac

Street:

8841 Don Horton Ave

City, State and Zip:

Las Vegas, NV 89178

Telephone #:

Same

/s/ Lyanna and Duong Lac
Lyanna and Duong Lac
Debtors

EXHIBIT 6